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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

UNITED STATES OF AMERICA,

Plaintiff,

vs.

THOMAS WILLIAM DORSHER,
AKA "SCAMMERBLASTER"

Defendant.

Case No. 2:22-CR-463

UNITED STATES' FIRST NOTICE OF
INTENT TO INTRODUCE
EVIDENCE PURSUANT TO RULE
404(b) OF THE FEDERAL RULES OF
EVIDENCE

Honorable Jill N. Parrish

The United States hereby gives notice of its intent to introduce evidence at trial of defendant THOMAS WILLIAM DORSHER's other crimes, wrongs, or acts pursuant to FED. R. EVID. 404(b). The United States believes much of the evidence identified herein is intrinsic evidence of the alleged criminal conspiracy, including its scope, the relationship of its participants, its operations, and its illicit nature. The United States additionally identifies that evidence here as alternatively admissible as extrinsic evidence to be admitted for

purposes permissible under Rule 404(b), but only in abundance of caution. The United States does not waive, and expressly reserves the right to present this evidence as intrinsic evidence or on other theories of admissibility independent of Rule 404(b) admissibility. Specifically, the United States may seek to introduce the following evidence:

- a) To show DORSHER's intent, knowledge, opportunity, lack of accident or mistake, and preparation, the United States will introduce evidence that DORSHER forwarded a so-called scambaiter's call flooding attack to the FBI's main line and brought it down for ten minutes;
- b) To show DORSHER's motive, intent, knowledge, lack of accident or mistake, and preparation, the United States will introduce evidence that DORSHER launched a robocalling/traffic pumping campaign that simultaneously served to promote ScammerBlaster and to generate revenues for DORSHER and ScammerBlaster operations in the amount of at least approximately \$291,123.02. He made approximately 9 million robocalls, playing the following message:

This is an important public service announcement. There is a rise in scam calls impacting people around the world. Many of these scammers are directly funding terrorist organizations, and in 2017, 16 billion dollars was scammed from Americans. Much of this money is used to fund terrorist organizations such as the Al-Qaeda and ISIS to further hurt our neighbors around the world. It is critical that you report any phone calls from these scammers to the FCC or to the phone company of the scammer. You can use free carrier look up tools to identify the carrier and then call or email the carrier so that the scammer's phone system is shut down. Most importantly, if someone with a foreign accent claims to be the IRS, Social Security Administration Office, Microsoft, Amazon, Cash App, or any other questionable source that generally doesn't call you, immediately hang up the call and report it on our website, scammerblaster.com. Again that's scammerblaster.com. Knowledge is power. If everyone refuses to fall victim to these scams, then the scammer's revenue source will dry up and together we can get this problem significantly reduced.

- c) To show DORSHER's motive, knowledge, intent, and lack of mistake or accident, evidence that DORSHER falsely identified himself on caller identifications as the "FBI," told his coconspirators about it, and encouraged them to impersonate the FBI as well;

- d) To show DORSHER's motive, intent, lack of accident or mistake, evidence that DORSHER recruited someone from a scam call center in a foreign country to divert the call center's customers/victims to DORSHER and his coconspirator by informing the victims the call center was a scam, but then providing nominal services that the customer did not actually need at predatory prices, with DORSHER suggesting they could charge "stupid Americans" what DORSHER called a "crazy amount of money" for the "fix" as long as they agreed to it;
- e) To show DORSHER's motive, intent, lack of accident or mistake, identity and modus operandi, evidence that DORSHER engaged in the conduct described in paragraphs 11(g) and 11(h) of the indictment, such as automated attacks and threats of automated attacks meant to overwhelm and disable law enforcement reporting portals for telephone services companies, as well as attacks involving what DORSHER and coconspirators described as "ear rape";
- f) To show DORSHER's lack of accident or mistake, identity, and modus operandi, evidence that DORSHER and his coconspirators targeted a paralegal at a telephone services company by forwarding calls to her; making unsolicited calls to her for the purpose of harassing her; flooding her phone and email; attacking her with calls using loud, hearing damaging noise in so-called "ear rape" attacks; hurling racist epithets at her and telling her to kill herself; and signing her up for multiple casual sex dating services so she would receive unsolicited, pornographic emails;
- g) To show DORSHER's intent and lack of accident or mistake, evidence that DORSHER recruited people whom he knew to have vulnerable mental health conditions and legal troubles with the police to aid him in his SCAMMERBLASTER activities.

The United States reserves the right to supplement this notice and to advance this evidence under other theories of admissibility, such as intrinsic evidence of the conspiracy.

See Indictment at ¶¶ 1-13.

Dated: April 22, 2024.

Respectfully submitted,

TRINA A. HIGGINS
United States Attorney

/s/ Carl D. LeSueur
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Assistant United States Attorney